

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JUDITH MAYES

Plaintiff,

v.

CASE NO: 2:08-cv-12235
HON: AVERN COHN
MAG: STEVEN R. WHALEN

VILLAGE OF NEW HAVEN and
BRETT HARRIS
in his individual and official capacity,

Defendants.

CHRISTOPHER TRAINOR & ASSOCIATES
CHRISTOPHER J. TRAINOR (P42449)
Attorney for Plaintiffs
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White Lake, MI 48386
(248) 886-8650

PLUNKETT COONEY
PETER W. PEACOCK (P37201)
Attorneys for Defendants
10 S. Main Street, Ste. 400
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STIPULATED PROTECTIVE ORDER

THIS MATTER having come before this Honorable Court upon stipulation of the parties, through their respective counsel, and the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED that any information contained in the personnel file of Brett Harris shall be subject to the following conditions:

1. The documents subject to this protective order shall be used solely and exclusively for the purposes of the instant lawsuit and can be used in any and all court filings, judicial proceedings, depositions, alternative dispute resolution proceedings, trial, and/or any other judicially-related proceedings. Any

documents subject to the Protective Order submitted to the court should be submitted under seal.

2. The documents subject to this protective order shall not be used in or for any other case, proceeding, dispute, or for any commercial, business, or competitive purpose whatsoever.
3. The documents subject to this protective order may be reviewed by Counsel for the parties, the named parties, Counsels' staff, those individuals associated with the activities cited in subparagraph (1), and such experts and/or consultants as Counsel deems necessary for purposes of this litigation and/or that are identified on witness lists.
4. The documents provided pursuant to this Protective Order may be disclosed only to those individuals and/or entities identified in this protective order and must be used only by those individuals and/or entities identified in this protective order and must be used for purposes of this litigation.

IT IS FURTHER ORDERED that nothing in this protective order shall prevent a party from filing a Motion for Modification of the Protective Order.

IT IS FURTHER ORDERED that this protective order shall survive and remain in full force and effect until the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation, unless otherwise ordered by the Court.

IT IS FURTHER ORDERED that the documents produced under this protective order do not constitute an admission and/or agreement that any such document is admissible as evidence in this case. Determinations of evidence admissibility will be made by the Court in a separate proceeding.

IT IS FURTHER ORDERED that any documents produced under this protective order and any copies of said documents provided to any individual by plaintiff's counsel shall be returned to defendant's counsel, Peter W. Peacock, upon settlement of this matter or upon entry of a final judgment after all appeals have been exhausted except for any documents attached to pleadings filed with the Court, deposition exhibits, or other pleadings.

Dated: January 26, 2009

s/Avern Cohn

HONORABLE AVERN COHN

We stipulate to entry of the above Order:

/s/ Christopher J. Trainor (w/consent)

Christopher J. Trainor (P42449)

Attorney for Plaintiff

/s/ Peter W. Peacock

Peter W. Peacock (P37201)

Attorney for Defendants

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